

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

PIONEER SERVICES, INC., )  
                               )  
Plaintiff,                 )  
                               ) CIVIL ACTION NO.: 2:06cv377-WKW  
v.                         )  
                               )  
AUTO-OWNERS INSURANCE )  
COMPANY, INC., et al.,    )  
                               )  
Defendants.                 )

**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on May 23, 2006, via telephone and was attended by:

- a. Harry P. Hall, II, Attorney for Plaintiff; and
- b. Roger S. Morrow, Joel H. Pearson, Attorneys for Defendant Auto-Owners Insurance Company.

2. **Pre-Discovery Disclosures.** The parties will exchange the information required by Rule 26(a)(1) by June 15, 2006.

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

- a. Discovery will be sought on the following subjects; all allegations in Plaintiff's Complaint and all allegations pled in Defendants' Answer.
- b. All discovery will be commenced in time to be completed by March 20, 2007.
- c. Maximum of 30 Interrogatories allowed by each party to each other party. Maximum of 30 Requests for Production of Documents allowed by each party to each other party. Maximum of 20 requests for Admissions allowed by each party to each other party. Responses are due thirty (30) days from the date of the requests.
- d. Maximum of ten (10) depositions by each party and limited to a

maximum of four (4) hours for non-parties and eight (8) hours for parties; These limitations can be extended by the court on motion of any party for good cause shown or by agreement of the parties.

- e. Reports from retained experts under Rule 26(a)(2) due:
  - i. From Plaintiff by December 15, 2006; Plaintiff's experts to be available for deposition by December 31, 2006.
  - ii. From Defendants by January 31, 2007; and Defendant's experts to be available for deposition by February 15, 2007.
- f. Supplementation under Rule 26(e) as provided by the Federal Rules of Civil Procedure shall take place as soon as possible and in no event later than March 1, 2007.

4. **Other Items.**

- a. A scheduling conference will be set by the Court, if it so chooses.
- b. The parties request the court set the deadline for amending pleadings as November 30, 2006.
- c. All potentially dispositive Motions should be filed by March 20, 2007.
- d. Settlement may be enhanced by the use of alternative dispute resolution procedures, but cannot be evaluated until the completion of discovery on March 20, 2007.
- e. The parties request a final pretrial conference in the third week of June 2007.
- f. Final lists of trial evidence, witness lists and deposition designations under Rule 26(a)(3) shall be filed and served as follows: by Plaintiff on or before May 15, 2007 and by Defendants on or before May 25, 2007. The parties will be allowed two weeks to complete depositions of any previously undisclosed witnesses whose identity is disclosed pursuant to this paragraph. The parties shall have 10 days after service of final lists of witnesses and exhibits to file objections under Rule 26(a) Federal Rules of Civil Procedure.
- g. The case should be ready for trial by July 9, 2007. Trial is currently expected to take approximately three days.

Respectfully submitted this \_\_\_\_\_ day of May, 2006.

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